

gross revenues minus charges paid to other carriers would also virtually eliminate a reseller's obligation to pay a fair share of number administration costs.

SBC therefore suggests that number administration costs be allocated to all telecommunications carriers on the basis of elemental access lines (EAL). Under this approach, access lines would counted by "element," indicative of their use in three different types of services: (1) local exchange service, (2) intraLATA toll service, and (3) interLATA toll service. The total number of EALs would include the sum of: (1) local exchange access lines (including both wireline and wireless), (2) intraLATA toll presubscribed access lines, and (3) interLATA toll presubscribed access lines.

SBC's proposed EAL method meets the Commission's definition of competitive neutrality and does not disadvantage new entrants, IXCs or ILECs due to disproportionate distribution of costs, customers or EALs. The Commission should therefore, on reconsideration, abandon its approach of gross revenues minus charges paid to other carriers, and adopt SBC's EAL approach.

B. VOLUNTARY CONVERSION OF WIRELESS NUMBERS IN A GEOGRAPHIC SPLIT

The Order declined to take any action to prevent the Texas Commission from taking back some wireless numbers in the course of introducing a geographic split plan. SBC does not seek reconsideration of such decision *per se*²⁸ but rather is concerned that language in the Order may be misconstrued as somehow preventing state commissions from using voluntary wireless conversions to lessen the burden of geographic splits on consumers. The Order provides that "in a geographic

²⁸ The estimated exhaust dates for the resulting area codes are such that any mandatory migration from the old area code to the other would effectively hasten the exhaust of the next area code exhaust in Dallas. Thus, mandatory conversions from the old area code to the new area code would not be practical, and it seems unlikely that any party will pursue such action.

split, roughly half of the customers in the existing NPA, including wireless customers, will have to change their telephone numbers.”²⁹ Such statement is untrue from a technology standpoint -- wireless customers are mobile by nature and thus their ability to use the service is not restricted if the handset is programmed with a different NPA than the surrounding land line system. For example, this occurs daily for roaming customers and for customers on a cellular systems whose service area encompasses several NPAs such as the Washington-Baltimore systems. To fully understand the issue, a brief primer on wireless technology may be useful. Both land line and wireless technology rely on the use of the 10 digit phone number to route calls to the proper location. With land line, the NPA is used to identify the general area in North America to send the call, the NXX is used to identify the central office within that area, and the last four digits for the line served by that central office. Cellular and PCS providers, however, rely on the full ten digit telephone number, or Mobile Identification Number (MIN), to deliver calls, validate subscribers, validate customers from other markets and bill. The wireless handset is a radio transmitter and receiver, and each handset is programmed with the full ten digit MIN. The handset identifies it to the system by broadcasting the 10 digit MIN and a unique Electronic Serial Number (ESN). Likewise, the system locates the handset by broadcasting the 10 digit MIN. Thus, the fact that the NPA portion of the MIN does not match the NPA of the surrounding land line system is of no consequence to the handset’s ability to place or receive calls. In order to change any portion of the MIN, including the NPA, the handset must be physically reprogrammed with the new MIN.³⁰ Such reprogramming

²⁹ Order at para. 308.

³⁰ The statement in the Order that “wireless customers may need to have their equipment reprogrammed to change their telephone number” is inaccurate. Such customers must have their phones reprogrammed to change the telephone number.

requires the returning of the handset to the carrier or the carrier's agent and the changing of the MIN in the handset, the network and the billing system.

The cellular and PCS networks consist of a series of cell sites linked to a Mobile Telephone Switching Office (MTSO), which is connected to the land line network. The MTSO basically performs the functions of a land line central office, along with various functions unique to wireless. The MTSO is connected to the land line network through either a tandem or central office. The wireless carrier may either receive telephone numbers in full NXX blocks of 10,000 or may share a NXX, normally with a land line carrier through a central office. Calls from the land line network to a wireless number are routed just as any other call using NPA/NXX to either the MTSO directly from the tandem or to the end office and then to the MTSO. The wireless carrier then broadcasts the MIN (i.e. 10 digit telephone number) combination throughout its service area to locate the handset, validate the handset and deliver the call. On mobile to land line calls, the handset broadcasts its ESN/MIN combination to the cell site where it is received and sent to the MTSO for validation to ensure the caller is a valid subscriber. If valid, the MTSO transmits the dialed numbers to the land line network, which then routes the call as any other call. In roaming situations, the handset transmits the MIN/ESN combination in the visited market, which uses such information to validate if a roaming agreement is in place and to route any validation request. If valid, the MTSO again transmits the dialed digits to the land line network, which processes the call as any other call. Likewise, if the roaming customer receives a call, the home market forwards the call to the visited market, which broadcasts the MIN to locate and validate the customer and to deliver the call. Thus, cellular and PCS systems are not bound by the geographic limitations associated with NPAs on the land line network.

Wireless systems by their very nature thus support telephone numbers from multiple NPAs and process calls accordingly every day. Consequently, an all service overlay for NPA relief does not cause major difficulties for wireless carriers and, in fact, matches the current capabilities of the wireless networks.

A geographic split has more of an impact because of the need to physically touch and reprogram the handset to change the MIN (i.e. telephone number). The reprogramming of phones, especially if required in a short period of time, is an expensive undertaking. In addition, having to reprogram the phone burdens the customer, who must physically return the handset and wait for it to be reprogrammed. Such costs and burdens are unnecessary. The simple fact is that the wireless technology does not require the changing of the telephone numbers.

From a practical standpoint, the boundaries of a geographic split must coincide with land line central office boundaries. The split boundaries thus do not coincide with the wireless carrier's service area or most likely the distribution of customers within an NXX. Unlike land line, the NXX of a wireless number does not have a specific geographic location, nor are the numbers within an NXX reserved for a particular geographic location – the numbers are assigned throughout the wireless carrier's service area to gain maximum efficiency.

Thus, after the split, a wireless NXX is going to have customers on both sides of the split boundary. Further, because of the mobile nature of the technology, the fact that a customer resides on one side of the boundary does not mean that the handset is going to be used on that side of the boundary or that the majority of the calls to or from the handset will coincide with that side of the boundary. In addition, to benefit the NPA relief effort, the wireless carrier would have to return the entire NXX block because of the North American Numbering Plan's reliance on the

NXX for routing purposes. Requiring a wireless carrier to return the entire NXX block would result not only in the expense associated with having to reprogram phones but would also force customers remaining in the old area code to switch their wireless number.

Requiring mandatory wireless conversions under a geographic split scenario, especially in a metropolitan area, many times is simply unnecessary and merely forces hardship on the wireless customers and expense on the wireless carrier. Thus, various state commissions have ordered voluntary rather than mandatory wireless conversions when adopting geographic split relief plans.³¹

SBC is concerned that the statement in the Order that, in a geographic split, "roughly half of the customers in the NPA, including wireless customer, will have to change their telephone numbers" could be misconstrued as precluding voluntary wireless conversions as part of a relief plan. Voluntary wireless conversions can play an important role in the NPA relief effort, especially when splitting metropolitan areas, as evidenced by their adoption by the Illinois Commerce Commission for the recent Chicago splits. Voluntary wireless conversion does not detrimentally impact any other party and does not impact the NPA relief effort. Burdens should not be imposed on wireless customers and wireless carriers merely because other parties have a burden—there must be a rationale basis for imposing the burden. The wireless customer is also the land line customer (i.e., most cellular customers also have land line service) – thus burdening

³¹ See, Illinois Bell Telephone Company, Petition for Approval of NPA Relief Plan for 708 Area Code by Establishing a 630 Area Code, 94-0315, Illinois Commerce Commission, Order, pp.26, 30 (Dated March 20, 1995); Illinois Bell Telephone Company, Petition for Approval of Stipulation and Agreement of parties for a 312 Relief Plan, Illinois Commerce Commission No. 95-0371, Order, pp. 10-14, 22-23 (dated November 20, 1995); In the Matter of the Investigation into the Exhaustion of Telephone Numbers in the 314 Numbering Plan Area, Missouri Public Service Commission No. TO-95-289, Report and Order, p. 13 (dated July 5, 1995).

a wireless customer because the land line customers is being burdened merely burdens the same individual twice. As the Illinois Commerce Commission has noted in upholding the voluntary conversions for the recent 312 split in Chicago:

There has been no showing that this provision harms the public or that its elimination would provide benefits to any other class or category of customer. Arguments against this provision (voluntary conversions) appear premised on the notion that we should create inconveniences and introduce inefficiencies merely so that everyone suffers from the area code split. This is an illogical and inappropriate basis for public policy-making.³²

The Commission should clarify that its language is not meant to preclude voluntary wireless conversions as part of an NPA geographic split plan, and in fact the Commission should encourage voluntary wireless conversions whenever feasible.

C. BURDEN ON WIRELESS CUSTOMERS TO CHANGE TELEPHONE NUMBERS
IN A GEOGRAPHIC SPLIT.

The Commission errs in stating that "requiring approximately half of the wireless and wireline customers to change their telephone numbers in a geographic split is an equitable distribution of burdens."³³ While having equal numbers of customers of different types of technology change their numbers gives an illusion of equitable treatment, much more time, effort and money are required to change a wireless number than a wireline number.

Both wireline and wireless customers need to make stationery changes and inform their friends and acquaintances or customers of their new number after an area code change. However, when the 214/972 area code split occurred in Dallas on September 14, 1996, the 972 wireline customers awakened to a phone number with a new area code. They did not have to go anywhere

³² ICC Chicago 312 Order, p. 23.

³³ Order at para. 308.

to get their new area code; they did not need to contact their phone company about receiving a new code. As far as wireline customers are concerned, there is no burden involved in actually getting a new area code. This is not the case for wireless phone numbers.

As stated previously, when a wireless customer has to change his/her phone number, the customer must physically bring the mobile phone into a wireless carrier's store and have it manually reprogrammed by a wireless carrier technician. Then the carrier must change the customer's number in its network and billing systems as well. This involves time and expense for the customer and the carrier. And, when a wireless carrier has to change thousands of its customers' phone numbers, the carrier needs to schedule customer visits to avoid excessive delays. This involves planning and notification. Thus, there is a much more significant burden involved in the changing of wireless customers' phone numbers than wireline customers'.

Again, such a "equitable distribution" is merely an unnecessary inconvenience on consumers and carriers. The wireless customers in a particular NXX will generally be located on both sides of the NPA boundary line. Thus a "rebalancing" will result either in:

1. If done by billing address, the same customers who are forced to change their land line number must also change the wireless number. Also, because customers in a NXX will be on both sides of the boundary, such a "billing address" procedure will not result in the return of an NXX block and thus does not contribute to the relief effort.
2. If done by NXX code to provide relief, customers, who reside within the old NPA after the split, must change their wireless number to either the new NPA or some other number in the old NPA. Either way, the customer must have the phone reprogrammed and change numbers.

Thus, in many relief efforts, requiring a rebalancing with a geographic split simply serves no practical purpose.

Therefore, SBC requests the Commission to reconsider its statement that requiring approximately half of the wireless customers and wireline customers to change telephone numbers in a geographic split is an equitable distribution of burdens. At the very least, the Commission should recognize that such "equitable distribution of the burdens" should be pursued only if it contributes to the relief effort. Imposing unnecessary burdens on customers for the sole purpose of achieving an "equitable distribution" is inappropriate.

D. ALL SERVICES OVERLAYS

Paragraph 286 of the Order sets out two conditions which must be met before an all-services overlay can be implemented. The second condition is:

" . . . availability to every existing telecommunications carrier, including CMRS providers, authorized to provide telephone exchange service, exchange access, or paging service in the affected area code 90 days before the introduction of a new overlay area code, of at least one NXX in the existing area code, to be assigned during the 90-day period preceding the introduction of the overlay."

SWBT interprets the requirement to assign at least one NXX to every authorized telecommunications carrier, including CMRS providers, to mean assignments to carriers which have not previously been assigned an NXX from the exhausting NPA. Providing an NXX to all providers, even those incumbent companies already having NXXs within the exhausting NPA, would be an inefficient use of the numbering resource.

In addition, SWBT interprets the Commission's second condition as requiring the assignment of NXXs to authorized, facility-based providers within the affected area. Assignment of NXXs to all authorized providers in the area, including non-facility-based providers, would mean the

assignment of NXX codes to carriers currently operating in an area without a unique NXX. Again, such a practice would be an inefficient use of the numbering resource and could dramatically accelerate exhaust. Within Kansas, for example, there are currently in excess of 250 non-facility-based carriers. These authorized providers do not currently have NXXs assigned to them. SWBT interprets the Commission's second condition NOT to include these providers.

E. INDUSTRY NUMBERING COMMITTEE

The Commission makes repeated reference to "our numbering administration guidelines" in discussing Number Administration. In subsequent references, the Commission refers to guidelines enumerated in the Ameritech Order -- CC Docket 92-237 -- as well as references to Guidelines contained within this docket.

CC Docket 92-237 references the Industry Numbering Committee (INC) as having "... successfully resolved many numbering issues ..." and goes on to say the "... INC today directs the efforts on the NANP Administrator ...".

SWBT encourages the Commission to reaffirm the role of the INC in the area of number administration. The INC has developed two sets of Guidelines, under the auspices of this Commission, which are commonly used as the groundwork for number administration in the NANP: "Central Office Code Assignment Guidelines," INC 95-0407-008, as well as the "NPA Code Relief Planning Guidelines," INC 94-1216-004. These guidelines, along with directives provided in orders from the FCC, provide a clear discussion of number administration responsibilities until the new NANPA assumes its duties.

V. CONCLUSION

For the reasons described above, the Commission must reconsider the Order and grant the relief requested herein.

Respectfully Submitted,

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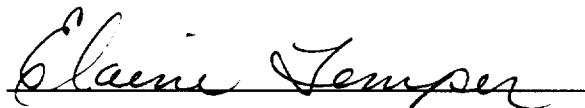
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Certificate of Service

I, Elaine Temper, hereby certify that the Comments of Southwestern Bell Telephone Company on Docket Nos. 96-98, 95-185, NSD File 96-8, 92-237 and No. 94-102 have been served this 7th day of October, 1996 to the Parties of Record.

A handwritten signature in cursive script, reading "Elaine Temper", written over a horizontal line.

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